

# EXHIBIT "A"



Connecticut's Official  
State Website

The Office of  
**Secretary of the State Denise W. Merri**

**Business Inquiry**

**Business Details**

Business Name:	FARMINGTON CASUALTY COMPANY	Citizenship/State Inc:	Domestic/CT
Business ID:	0158280	Last Report Filed Year:	NONE
Business Address:	NONE	Business Type:	Other/Insurance
Mailing Address:	NONE	Business Status:	Active
Date Inc/Registration:	Aug 24, 1982		
Annual Report Due Date:	Not Applicable		
NAICS Code:	NONE	NAICS Sub Code:	NONE

**Principals Details**

No Principal required for Business with Id: 0158280

**Agent Summary**

Agent Name	CORPORATION SERVICE COMPANY
Agent Business Address	50 WESTON ST., HARTFORD, CT, 06120
Agent Residence Address	NONE

**SUMMONS**Attorney(s) JEFFREY A. BRONSTER, ESQ.Office Address 17 Wendell PlaceTown, State, Zip Code Fairview, NJ 07022Telephone Number (201) 945-2566

Attorney(s) for Plaintiff \_\_\_\_\_

EVELYN KELLING

Plaintiff(s)

Vs.

FARMINGTON CASUALTY COMPANY

Defendant(s)

**Superior Court of  
New Jersey**OCEAN COUNTYLAW DIVISIONDocket No: OCN-L-1552-20**CIVIL ACTION  
SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

/s/ Michelle M. Smith

Clerk of the Superior Court

DATED: 07/01/2020Name of Defendant to Be Served: Farmington Casualty CompanyAddress of Defendant to Be Served: One Tower Square, Hartford, CT 06183

JEFFREY A. BRONSTER, ESQ.

17 Wendell Place

Fairview, New Jersey 07022

(201) 945-2566

Attorney ID# 049411988

Attorney for Plaintiff

-----x		SUPERIOR COURT OF NEW JERSEY
EVELYN KELLING,	:	LAW DIVISION: OCEAN COUNTY
	:	DOCKET NO. OCN-L-
Plaintiff,	:	
	:	Civil Action
vs.	:	
	:	
FARMINGTON CASUALTY	:	COMPLAINT
COMPANY (a subsidiary of	:	
Travelers Casualty and Surety	:	(Discovery Demands Attached)
Company Inc.),	:	
	:	
Defendant.	:	
-----x		

The plaintiff, Evelyn Kelling, by way of Complaint against the defendant, hereby states as follows:

### COUNT ONE

1. The plaintiff, Evelyn Kelling, is a resident of Forked River, New Jersey, County of Ocean.

2. Defendant Farmington Casualty Company is an insurance company, having its principal place of business at One Tower Square, Hartford, Connecticut 06183 .

3. At the times relevant to this Complaint, Plaintiff was also the owner of a residence located at 225 81<sup>st</sup> Street in Brooklyn, New York ("the Property").

4. At the times relevant to this Complaint, the Property was insured under a policy issued by Defendant.

5. In or about December 2019, on an exact date unknown to Plaintiff, a pipe inside the Property burst, causing extensive damage both to the residence itself and to the personal property contained therein.

6. The aforesaid incident constituted a covered occurrence under Plaintiff's insurance policy with Defendant.

7. Nevertheless, by letter of June 10, 2020, in breach of the contract of insurance, Defendant denied coverage, whereby the plaintiff has been damaged.

**WHEREFORE**, Plaintiff demands judgment against the defendant for a declaratory judgment of coverage, compensatory damages, consequential damages, interest, costs of suit, and such further relief as the Court deems just and proper.

/s/ Jeffrey A. Bronster  
JEFFREY A. BRONSTER, ESQ.  
Attorney for the Plaintiff

Dated: July 1, 2020

**JURY DEMAND**

The plaintiff hereby demands a trial by jury as to all issues asserted in the pleadings so triable as of right.

/s/ Jeffrey A. Bronster  
JEFFREY A. BRONSTER, ESQ.  
Attorney for the Plaintiff

Dated: July 1, 2020

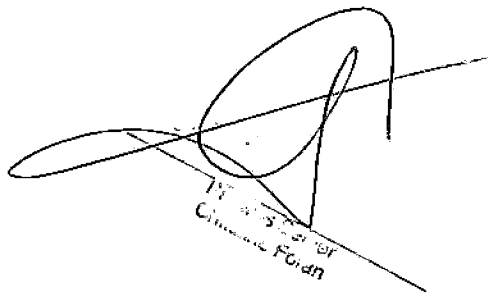
**CERTIFICATION PURSUANT TO R. 4:5-1(b)(2) and (b)(3)**

I certify to the best of my knowledge and belief that the subject matter of this Complaint is not the subject of any other pending or contemplated lawsuit or proceeding; that no other persons should be named as parties hereto; and that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b). I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing is wilfully false I am subject to punishment.

/s/ Jeffrey A. Bronster

JEFFREY A. BRONSTER

DATED: November 25, 2019



Handwritten signature of Jeffrey A. Bronster, with the name "Jeffrey A. Bronster" and "Clerk of Court" printed below it.

**NOTICE TO PRODUCE TO THE DEFENDANT**

**PLEASE TAKE NOTICE** that you are to produce each of the documents listed below within the time provided by the Rules of the Court:

1. Your entire underwriting file for the policy that is the subject matter of this Complaint.

2. All documents relating to any renewal of Plaintiff's policy.

3. Your entire claims file for the occurrence that is the subject matter of this Complaint, including the file of any independent adjuster or expert retained by you in connection with the claim.

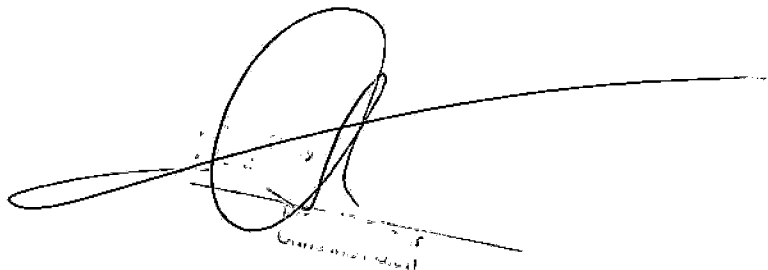
4. All correspondence, including electronic, between you and the plaintiff, or any representative of the plaintiff, including, but not limited to, any insurance agent, insurance broker, or public adjuster.

5. The report of any expert you intend to rely upon at the trial of this action.

6. All documents that you intend to rely upon at time of trial not otherwise produced in response to this Notice.

/s/ Jeffrey A. Bronster  
JEFFREY A. BRONSTER, ESQ.  
Attorney for the Plaintiff

Dated: July 1, 2020

A handwritten signature in black ink, appearing to read 'Jeffrey A. Bronster', is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke extending to the right.

**INTERROGATORIES TO THE DEFENDANT**

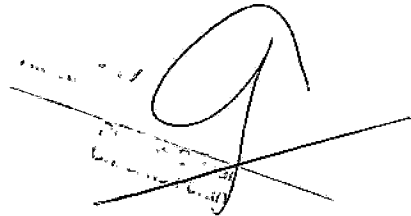
**PLEASE TAKE NOTICE** that you are to respond to each of the interrogatories below within the time provided by the Rules of the Court:

1. State in detail each basis for your denial of Plaintiff's claim, including, where appropriate, citations to specific policy provisions.

2. Identify all persons with knowledge of any facts relating to this action, and state in detail the facts known to each such person.

/s/ Jeffrey A. Bronster  
JEFFREY A. BRONSTER, ESQ.  
Attorney for the Plaintiff

Dated: July 1, 2020

A handwritten signature in black ink, appearing to be 'J. Bronster', written over a horizontal line. There are some faint, illegible markings below the signature.



## Civil Case Information Statement

Case Details: OCEAN Civil Part Docket# L-001552-20

**Case Caption:** KELLING EVELYN VS FARMINGTON

CASUALTY COMPANY

**Case Initiation Date:** 07/01/2020

**Attorney Name:** JEFFREY A BRONSTER

**Firm Name:** JEFFREY A. BRONSTER ESQ

**Address:** 17 WENDELL PLACE

FAIRVIEW NJ 07022

**Phone:** 2019452566

**Name of Party:** PLAINTIFF : Kelling, Evelyn

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** CONTRACT/COMMERCIAL TRANSACTION

**Document Type:** NJ eCourts Case Initiation Confirmation

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Are sexual abuse claims alleged by:** Evelyn Kelling? NO

**THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE**

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** YES

**If yes, is that relationship:** Business

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

07/01/2020

Dated

/s/ JEFFREY A BRONSTER

Signed

OCN L 001552-20 07/03/2020 4:20:38 AM Pg 1 of 1 Trans ID: LCV20201163255

OCEAN COUNTY SUPERIOR COURT  
OCEAN COUNTY COURTHOUSE  
CIVIL LAW DIVISION  
TOMS RIVER NJ 08754

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 504-0700  
COURT HOURS 8:30 AM - 4:30 PM

DATE: JULY 02, 2020  
RE: KELLING EVELYN VS FARMINGTON CASUALTY COMPANY  
DOCKET: OCN L -001552 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

THE MANAGING JUDGE ASSIGNED IS: HON ROBERT E. BRENNER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002  
AT: (732) 504-0700.

THE SUPREME COURT HAS APPROVED A PILOT PROGRAM IN THIS COUNTY TO EXPEDITE  
CIVIL ACTIONS. THIS CASE HAS BEEN ASSIGNED TO THE EXPEDITED CIVIL (ECA) PILOT PROGRAM.

DISCOVERY IS 195 DAYS AND RUNS FROM THE FILING OF THE FIRST RESPONSIVE PLEADING.

YOU MAY SEEK REMOVAL FROM THE ECA PILOT PROGRAM BY FILING AND SERVING A  
LETTER OF INTENT SETTING FORTH THE BASIS FOR REMOVAL FROM THE ECA PILOT PROGRAM  
NO LESS THAN 10 DAYS PRIOR TO THE INITIAL CASE MANAGEMENT CONFERENCE. A PARTY  
MAY FILE AND SERVE A LETTER OBJECTING TO REMOVAL FROM THE ECA PILOT PROGRAM NO  
LESS THAN 5 DAYS BEFORE THE INITIAL CASE MANAGEMENT CONFERENCE.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.

PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: JEFFREY A. BRONSTER  
JEFFREY A. BRONSTER ESQ  
17 WENDELL PLACE  
FAIRVIEW NJ 07022

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